



**ALTERNATIVE  
BAKING COMPANY, INC.**  
"Our goal is to make the best cookies in the Galaxy!"

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Date: 15 August 2005

Arthur Neal, Director, Program Administration  
National Organic Program  
USDA-AMS-TMP-NOP  
1400 Independence Ave., SW., Room 4008  
So. Ag Stop 0268  
Washington, DC 20250

Via E-mail: [National.List@usda.gov](mailto:National.List@usda.gov)  
Via Fax: (202) 205-7808

Dear Mr. Neal,

The following comments are in reference to USDA, Agricultural Marketing Service Docket Number TM-04-07 concerning 7 CFR Part 205, National Organic Program Sunset Review process.

Alternative Baking Company, Inc. thanks the United States Department of Agriculture and the National Organic Standards Board for the opportunity to comment on the Sunset Review of the 2002 National List. We support the list as published, and would like to especially support the following material(s):

**Lecithin (unbleached)**, as found in National List Section § 205.606 Nonorganically produced agricultural products allowed as ingredients in or on processed products labeled as "organic" or "made with organic [specific ingredients or food group(s)]." This substance is used as an emulsifier in the production of organic chocolate.

Alternative Baking Company, Inc. currently uses organic chocolate to produce organic biscotti and cookies. Organic chocolate chips [made with lecithin (unbleached)] are a key ingredient in our formulation without which we would be unable to produce our organic biscotti and cookies and still achieve the over 70% organic ingredients required to be labeled organic. This is a key selling point of our biscotti and cookies to the hundreds of thousands of consumers who support our products nationwide.

Although we are aware that organic lecithin (unbleached) has been produced, after running tests the producer of our organic chocolate has found the quality and characteristics of organic lecithin is not suitable. At this time there is no suitable organic alternative to the natural, non-GM lecithin (unbleached) that is currently being used. Therefore, it is essential that lecithin (unbleached) be kept on the National List Section § 205.606.

Sincerely,

Scott Ostrander  
Marketing Manager  
Alternative Baking Company, Inc.